## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

CORPORAL TRINIDAD NAVARRO,

Plaintiff, C.A. No. 05-565 GMS

JURY TRIAL DEMANDED v.

CHRISTOPHER A. COONS.

individually and in his official capacity; GUY H. SAPP, individually and in his official capacity; and NEW CASTLE COUNTY, a municipal corporation,

Defendants.

## DEFENDANTS, CHRISTOPHER A COONS, GUY H. SAPP AND NEW CASTLE **COUNTY'S MOTION FOR SUMMARY JUDGMENT**

Defendants, Christopher A. Coons, Guy H. Sapp and New Castle County, through their undersigned counsel, respectfully move for summary judgment on all counts of the Complaint of Plaintiff Trinidad Navarro. The grounds for this Motion are set forth in the Opening Brief in Support of Defendants Motion for Summary Judgment, which is filed separately.

Respectfully submitted,

Dated: July 17, 2006 /s/ Michele D. Allen

> Michelle D. Allen, (I.D. #4359) **Assistant County Attorney** Judith A. Hildick (I.D. #3244) First Assistant County Attorney Megan Sanfrancesco (I.D. #3801) First Assistant County Attorney New Castle County Law Department 87 Reads Way

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Attorneys for Defendants Christopher A. Coons and Guy H. Sapp in their official capacities and New

Castle County

## And

Jeffrey S. Goddess, Esquire (I.D. #630) Rosenthal, Monhait & Goddess, P.A. 919 Market Street, Suite 1401 P.O. Box 1070 Wilmington, DE 19899 Attorney for Christopher A. Coons and Guy H. Sapp in their individual capacities